

FILED

NOV 5 2020

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AUSTIN SURAUD and
MICHAELA BOYSTER,

Defendants.

4:20CR00705 HEA/JMB

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or between June 11, 2020 and July 1, 2020, in the County of Jefferson, within the Eastern District of Missouri,

AUSTIN SURAUD,

the Defendant herein, knowingly possessed a firearm, a Smith and Wesson make, M&P 15 model, .556 caliber rifle, bearing serial number TN69133, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearm previously traveled in interstate or foreign commerce during or prior to being in Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1) and punishable under Title 18, United States Code Section 924(a)(2).

COUNT TWO

The Grand Jury further charges that:

On or about June 11, 2020, in the County of Jefferson, within the Eastern District of Missouri,

MICHAELA BOYSTER,

the Defendant herein, in connection with the acquisition of a firearm, a Smith and Wesson make, M&P 15 model, .556 caliber rifle, bearing serial number TN69133, from Dunn's Sporting Goods, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and/or fictitious written statement to Dunn's Sporting Goods, which statement was intended and likely to deceive Dunn's Sporting Goods, as to a fact material to the lawfulness of such sale of the said firearm to Defendant under Chapter 44 of Title 18, United States Code, in that Defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of the firearm indicated on the Form 4473, when in fact, as Defendant then knew, she was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 922(a)(6) and punishable under Title 18, United States Code, Section 924(a)(2).

A TRUE BILL

FOREPERSON

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